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March 17, 2025

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VIA ECF

Hon. Judge Katherine Polk Failla
United States District Court
Southern District of New York
40 Foley Square, Room 2103
New York, NY 10007

Re: Chakma, et al. v. Sushi Katsuei, Inc, et al.

Case No. 1:23-cv-07804-KPF

Dear Judge Failla:

This office represents Defendants in the above referenced matter. I write to respectfully request an extension of time to produce the required list of the class and subclass members by April 14, 2025, and the Parties' time to submit a joint letter at a later date after the Defendants' requested deadline.

Pursuant to Your Honor's Individual Rules, Section C (i), Defendants write as follows:

1. Pursuant to the Court's February 7, 2025 Order, Defendants were required to provide the requested list of all class and subclass members' information by March 15, 2025, and the Parties are instructed to submit a joint letter on or before March 31, 2025 (See, Dkt No. 60);
2. This is Defendants' first time requesting an extension of time to provide the list of the class and subclass members;
3. The reason for asking such request is that Counsel was informed that Defendants have been going through some family-related issues that require both of Defendants' immediate care and attention. Additionally, Counsel was further informed that one of the Individual Defendants, Mr. Win, has been suffering from a medical condition and his physical condition also contributed to causing Defendants' inadvertent delay in gathering all of the necessary information of the requested list;

SG

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4. Plaintiffs graciously consented to extend Defendants' time, but only until March 21, 2025. Counsel for Defendants makes such request to the Court to have additional days for Defendants to gather and produce a complete list to Plaintiffs by **April 14, 2025**, in consideration of Defendants' unforeseen circumstances causing such inevitable delay; and,
5. Currently, the Parties are directed to submit a joint letter by March 31, 2025, proposing the next steps in the case, and Defendants respectfully request that the Court allow the Parties to submit a joint letter at a later date after Defendants provide a complete list to Plaintiffs by April 14, 2025.

We thank the Court for its time and continued attention to this matter.

Respectfully Submitted,

Seo Law Group, PLLC

By: /s/ Diana Seo

Diana Y. Seo, Esq.

Attorneys for Defendants

cc: All counsel of record (via ECF)